STATE OF NEW HAMPSHIRE
Department of Environmental Services
Air Resources Division

Title V Operating Permit

Permit No: **TV-OP-012** **Minor Amendment Dated April 5, 2001**
Date Issued: **March 9, 1999**

This certifies that:
Prime Tanning Company, Inc.
P.O. Box 5050
Rochester, NH 03866

has been granted a Title V Operating Permit for the following facility and location:
Prime Tanning Company, Inc.
216 Airport Drive
Rochester, NH 03866
AFS Point Source Number - 3301700059

This Title V Operating Permit is **hereby amended and reissued** under the terms and conditions specified in the Title V Operating Permit Application filed with the New Hampshire Department of Environmental Services on December 1, 1997 **and supplement received on February 21, 2001** under the signature of the following responsible official certifying to the best of their knowledge that the statements and information therein are true, accurate and complete.

Responsible Official:
M. R. Todd
Manager
(603) 330-3100
Technical Contact:
Eric Snyder
Environmental Manager
(603) 330-2043

This Permit is issued by the New Hampshire Department of Environmental Services, Air Resources Division pursuant to its authority under New Hampshire RSA 125-C and in accordance with the provisions of Code of the Federal Regulations 40 Part 70.

This Title V Operating Permit shall expire on **March 31, 2004**.

SEE ATTACHED SHEETS FOR ADDITIONAL PERMIT CONDITIONS

For the New Hampshire Department of Environmental Services, Air Resource Division

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Director, Air Resources Division

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Facility Specific Title V Operating Permit Conditions

I. Facility Description of Operations:

Prime Tanning=s Rochester, NH facility houses both administrative offices and leather finishing operations. The process equipment located at the facility includes: combustion equipment, coating operations, insignificant activities, and equipment which do not generate emissions (exempt).

Combustion sources which are located at Prime Tanning=s Rochester, NH facility include two 300 horsepower boilers, one 30 kW emergency generator, three preheating units, and twenty three small space heating units.

Coating operations include eight rotary spray paint booths, two roll coaters and dryer, six hand spray booths, four direct application coaters, and one tipping table. Several other operations are located at the facility, most of which are not emission sources or exempt emission units.

II. Permitted Activities:

In accordance with all of the applicable requirements identified in this permit, the permittee is authorized to operate the devices and or processes identified in Sections III, IV, and V within the terms and conditions specified in this Permit.

III. Significant Activities Identification:

A. The activities identified in the following table (Table 1) are subject to and regulated by this Title V Operating Permit:

Table 1 - Significant Activity Identification

Emission Unit Number (EU#)	Description of Emission Unit	Exhaust Stack Identification	Emissions Unit Maximum Allowable Permitted Capacity
EU1	Cleaver Brooks Boiler #1	Stack #1	12.6 million Btu per hour gross heat input of natural gas with a maximum sulfur content of 5 grains of sulfur per 100 cubic feet, equivalent to 12,600 cubic feet of natural gas per hour
EU2	Cleaver Brooks Boiler #2	Stack #2	12.6 million Btu per hour gross heat input of natural gas with a maximum sulfur content of 5 grains of sulfur per 100 cubic feet, equivalent to 12,600 cubic feet of natural gas per hour
EU3	Hide Spray Paint and Drying Operations: (Three) Whole Hide Spray Paint Booths/Dryers; and (Five) Side Spray Paint Booths/Dryers	Stacks #3, #4, #5, & #6	Facility wide Volatile Organic Compound (VOC) limit of 273 pounds per day on a 365 day rolling average, corresponding to potential annual emissions of 49.8 tons VOC per year, limiting the facility wide emissions below the 50 ton per year VOC RACT threshold;

Table 1 - Significant Activity Identification			
			operating hours limited to 24 hours per day, 365 days per year except for the use of the Splash/Clubhouse coating which shall be limited to 13 hours per day
EU4	Roll Coaters (Two) and Roll Coater Dryer #1	Stack #7 (Roll Coater Dryer #1) Roll Coaters (Two) vented within the building	Facility wide VOC limit of 273 pounds per day on a 365 day rolling average, corresponding to potential annual emissions of 49.8 tons VOC per year, limiting the facility wide emissions below the 50 ton per year VOC RACT threshold; operating hours limited to 24 hours per day, 365 days per year except for the use of the Splash/Clubhouse coating which shall be limited to 13 hours per day
EU5	Hand Spray Paint Booth Operations: (Six) Hand spray paint booths	Stack #8	Facility wide VOC limit of 273 pounds per day on a 365 day rolling average, corresponding to potential annual emissions of 49.8 tons VOC per year, limiting the facility wide emissions below the 50 ton per year VOC RACT threshold; operating hours limited to 24 hours per day, 365 days per year except for the use of the Splash/Clubhouse coating which shall be limited to 13 hours per day
EU6	Direct Application Coating Operations: (Four) Direct Application Coaters	Vented within the building	Facility wide VOC limit of 273 pounds per day on a 365 day rolling average, corresponding to potential annual emissions of 49.8 tons VOC per year, limiting the facility wide emissions below the 50 ton per year VOC RACT threshold; operating hours limited to 24 hours per day, 365 days per year except for the use of the Splash/Clubhouse coating which shall be limited to 13 hours per day
EU7	Tipping Table	Vented within the building	Facility wide VOC limit of 273 pounds per day on a 365 day rolling average, corresponding to potential annual emissions of 49.8 tons VOC per year, limiting the facility wide emissions below the 50 ton per year VOC RACT threshold; operating hours limited to 24 hours per day, 365 days per year except for the use of the

Table 1 - Significant Activity Identification			
			Splash/Clubhouse coating which shall be limited to 13 hours per day
EU8	All Prime Tanning Emergency Generators (See Appendix A for a listing of all Emergency Generators located at the Prime Tanning facility.)	Stacks Vary	500 hours of operation during any consecutive 12 month period for any individual unit, the combined theoretical potential emissions of NOx from all such generators are limited to less than 25 tons for any consecutive 12 month period

Stack Criteria:

B. The following stacks for the above listed significant devices at this facility shall discharge vertically without obstruction (including rain caps) and meet the following criteria in accordance with the state-only modeling requirements specified in Env-A 1300 and Env-A 1400:

Table 2 - Stack Criteria			
Stack #	Minimum Stack Height (Feet)	Maximum Stack Diameter (Feet)	Minimum Exhaust Air Flow Rate (scfm)
Stack #1 (Boiler #1)	45	1.67	4400 (acfm)
Stack #2 (Boiler #2)	45	1.67	4400 (acfm)
Stack #3 (Whole Hide Spray Booths)	40	2.83	19924
Stack #4 (Whole Hide Booth Dryers)	40	1.167	2514
Stack #5 (Side Spray Booths)	42	2.83	15000
Stack #6 (Side Spray Booth Dryers)	42	1.167	2514
Stack #7 (Roll Coater Dryer)	40	1.167	2514
Stack #8 (Hand Spray Paint Booths)	40	2.83	20000

Preauthorized changes to the state-only requirements pertaining to stack parameters (set forth in this permit), shall be permitted only when an air quality impact analysis which meets the criteria of Env-A 606 is performed either by the facility or the New Hampshire Department of Environmental Services, Air resources Division (hereafter referred to as the ADES≅) [if requested by facility in writing] in accordance with the ADES Policy and Procedure for Air Quality Impact Modeling≅. All air modeling data shall be kept on file at the facility for review by the DES upon request.

IV. Insignificant Activities Identification:

All activities at this facility that meet the criteria identified in the New Hampshire Rules Governing the Control of Air Pollution Part Env-A 609.03(g), shall be considered insignificant activities. Emissions from the insignificant activities shall be included in the total facility emissions for the emission-based fee calculation described in Section XXIII of this Permit.

V. Exempt Activities Identification:

All activities identified in the New Hampshire Rules Governing the Control of Air Pollution Env-A 609.03(c) shall be considered exempt activities and shall not be subject to or regulated by this Title V Operating Permit.

VI. Pollution Control Equipment Identification:

The devices and/or processes identified in Table 3 are considered pollution control equipment or techniques for each identified emissions unit:

Table 3 - Pollution Control Equipment Identification

Pollution Control Equipment Number (PCE#)	Description of Equipment	Minimum Efficiency of Equipment	EU#
PC1	Each spray booth equipped with high volume low pressure (HVLP) spray guns and dry filter pads for particulate matter collection and removal.	90 percent particulate matter collection efficiency for the Columbus Industries high efficiency dry filter pads	Stack #8 - Six Hand Spray Booths (Combined Stack)
PC2	Each spray booth is equipped with high volume low pressure (HVLP) spray guns and a water curtain system for particulate matter collection and removal.	97 percent particulate matter collection efficiency for the water curtain system	Stack #3 - Each of three Whole Hide Spray Booths and Stack #5 - Each of five Side Spray Booths

VII. Alternative Operating Scenarios:

No alternative operating scenarios were identified for this Permit.

VIII. Applicable Requirements:

A. State-only Enforceable Operational and Emission Limitations:

The Permittee shall be subject to the state-only operational and emission limitations identified in Table 4 below.

Table 4 - State-only Enforceable Operational and Emission Limitations

Item #	Regulatory Cite	Applicable Emission Unit	Applicable Requirement
1.	Env-A 1305.01(a)	Facility Wide	New or modified devices, new or modified area sources, and existing devices or area sources for which new applications for permits are filed that have the potential to emit, in any amount, substances that meet the criteria of Env-A 1301 shall be subject to Env-A 1300, until such time as the Env-A 1400 requirements supersede the Env-A 1300 requirements. (As outlined below)
2.	Env-A 1305.02	Facility Wide	Air quality impact analysis of devices and area sources emitting substances meeting the criteria of Env-A 1301 shall be performed in accordance with the ADES Policy and Procedure for Air Quality Impact Modeling≅ or other comparable dispersion modeling methods approved by EPA.
3.	Env-A 1403.01	Facility Wide	In accordance with Env-A 1403.01, new or modified devices or processes installed after May 8, 1998, shall be subject to the requirements of Env-A 1400.
4.	Env-A 1403.02(a)	Facility Wide	In accordance with 1403.02(a), all existing unmodified devices or processes which are in operation during the transition period ending three years from May 8, 1998 (May 8, 2001), shall comply with either Env-A 1300 or Env-A 1400.
5.	Env-A 1403.02(b)	Facility Wide	In accordance with Env-A 1403.02(b), all existing devices or processes in operation after the transition period ending three years from May 8, 1998 (May 8, 2001), shall comply with Env-A 1400. Env-A 1300 will no longer be in effect.
6.	Env-A 1404.01(d)	Facility Wide	In accordance with Env-A 1404.01(d), documentation for the demonstration of compliance shall be retained at the site, and shall be made available to the DES for inspection.
7.	Env-A 1405.02	Facility Wide	In accordance with Env-A 1405.02 the owner of an existing device or process requiring a permit modification under chapter Env-A 1400 shall submit to the DES no later than one year prior to the end of the transition period (May 8, 2000), an application for a modification to a title V permit in accordance with Env-A 609.18, and a request to the DES to perform air dispersion modeling.
8.	Env-A 1405.03	Facility Wide	In accordance with Env-A 1405.03 the owner of an existing device or process requiring a permit under Env-A 1300 shall submit to the DES no later than one year prior to the end of the transition period (May 8, 2000), a compliance plan identifying how the device or process will comply with chapter Env-A 1400 by the end of the transition period. The compliance plan shall contain the dates when the information required in Env-A 1405.02 will be filed with the DES.
9.	Env-A 1406.01	Facility Wide	In accordance with Env-A 1406.01 the owner of any device or process which emits a regulated toxic air pollutant shall determine compliance with the ambient air limits by using one of the methods provided in Env-A 1406.02, Env-A 1406.03, or Env-A 1406.04. Upon request, the owner of any device or process which emits a regulated toxic air pollutant shall provide documentation of compliance with the ambient air limits to the DES. Based upon modelling submitted by the permittee and reviewed by DES staff, Prime Tanning has elected to restrict the hours of use of

Table 4 - State-only Enforceable Operational and Emission Limitations			
			their Splash/Clubhouse coating, which contains 2-Heptanone, to 13 hours per day.

10. Should the facility wish to introduce a new compound into the process or increase the rate of use of a compound from that which was considered at the date of issuance of this Permit, then the following steps are required to determine if the resulting individual toxic emission rates are in compliance with the New Hampshire Ambient Air Limits ("NHAAL"):

a. Calculate the maximum pounds per hour of each of the individual toxic that will be introduced and/or increased by the proposed process change and emitted from the process in any 24 hour period by using the following equation individually for each toxic:

$$ER = [(\frac{C}{24\ Hours\ Per\ Day})*(\frac{W}{100\%})*(\frac{100 - EF}{100\%})]$$

Where:

ER = The emission rate of the individual toxic, (in pounds per hour);
C = Total amount of the coating used per day, (in pounds).
W = The weight percentage of the individual toxic present in each of the coatings, (in percent);
EF = The emission factor of individual air toxic:
For Solids - assume 80 percent capture by the product and 20 percent is emitted to the atmosphere;
For Volatile Compounds assume 100 percent of the chemical constituent present in the coating volatilizes to the atmosphere.

b. The following equation shall be used to determine if the chemical constituent is in compliance with the NHAAL:

$$MI = (ER)*(216.0\frac{mg/m^3}{1.0lb/hr})$$

Where:

MI = The maximum concentration of the chemical constituent used to compare to the NHAAL, (in ug/m^3).
lb/hr = Pounds per hour.
ug/m^3 = Micrograms per cubic meter.
216.0 ug/m^3 divided by 1.0 lb/hr is the facility specific impact number for the worst stack, which is based on modeling performed by EarthTech on October 28, 1998.

c. Compare the maximum concentration calculated from the equation in condition VIII.A.15.b to the most current NHAAL for the particular chemical constituent. If the chemical constituent is not found on the NHAAL list, the DES should be contacted to determine if the chemical constituent should be regulated; and

d. Documentation of all proposed process changes shall be submitted to the DES for review, along with copies of all calculations verifying that the proposed process change is in compliance with the NHAALs and the conditions of this permit.

VIII. B. Federally Enforceable Operational and Emission Limitations

The Permittee shall be subject to the federally enforceable operational and emission limitations identified in Table 5 below.

Table 5 - Federally Enforceable Operational and Emission Limitations			

Table 5 - Federally Enforceable Operational and Emission Limitations

Item #	Regulatory Cite	Applicable Emission Unit	Applicable Requirement
1.	40 CFR 60 Subpart A Section 60.7 Notification & Record keeping	EU1 & EU2	(A) The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the boilers. (B) The permittee shall notify the DES of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies and follow procedures established for permit amendments as outlined in Sections 15., 16., 17., and 18. of this permit; unless that change is specifically exempted under an applicable subpart or in ɔ60.14(e).
2.	40 CFR 60 Subpart A Section 60.11	EU1 & EU2	(A) At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. (B) Compliance with opacity standards shall be determined by conducting observations in accordance with Reference Method 9 in 40 CFR 60, Appendix A.
3.	40 CFR 60 Subpart A Section 60.12 Circumvention	EU1 & EU2	No owner or operator subject to the provisions of 40 CFR 60 Subpart A shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.
4.	Env-A 606	Facility Wide	Air pollution dispersion modeling impact analysis requirements in order to determine compliance with the state implementation plan, RSA 125-C, RSA 125-I, and any rules adopted thereunder.
5.	Env-A 1204.27(a)	Facility Wide	The Permittee has accepted a facility wide VOC limit of 273 pounds per day on a 365 day rolling average, corresponding to potential annual emissions of 49.8 tons per year, limiting facility wide VOC emissions to less than 50 tons during any consecutive 12 month period to stay below the applicablility threshold of Env-A 1204.27(a).
6.	Env-A 1211.02(j)(1)	All Emergency Generators[1]	All emergency generators shall be limited to les than 500 hours of operation during any consecutive 12 month period.
7.	Env-A 1211.02(j)(2)	All Emergency Generators	The combined theoretical potential emissions of Nox from all generators are limited to less than 25 tons for any consecutive 12 month period.
8.	Env-A 1605.01	Facility Wide	Gaseous fuel shall contain no more than 15 grains of sulfur per 100 cubic feet of gas, calculated as hydrogen sulfide at standard temperature and pressure.
9.	Env-A 2003.02	EU1 & EU2	No owner or operator shall cause or allow average opacity from fuel burning devices installed after May 13, 1970 in excess of 20 percent for any continuous 6 minute period in a 60 minute period.
10.	Env-A 2003.04	EU1 & EU2	For steam generating units subject to 40 CFR 60, no more than one of the following two exemptions shall be taken: (A) During periods of startup, shutdown and malfunction, average opacity shall be allowed to be in excess of 20 percent for one period of 6 continuous minutes in any 60 minute period; or (B) During periods of normal operation, soot blowing, grate cleaning, and cleaning

[1] Please refer to Attachment 1 in Appendix A for a listing of all Emergency Generators at the Prime Tanning Facility.

Table 5 - Federally Enforceable Operational and Emission Limitations

			of fires, average opacity shall be allowed to be in excess of 20 percent but not more than 27 percent for one period of 6 continuous minutes in any 60 minute period.
11.	Env-A 2003.08(c)(1)	EU1 & EU2	No owner or operator shall cause or allow emissions of particulate matter from fuel burning devices installed on or after January 1, 1985, in excess of the rates set forth below, where: (A) "E" means the maximum allowable particulate matter emission rate in $lb/10^6$ BTU; (B) "I" means the maximum gross heat input rate in $l0^6$ BTU/hr; (C) For devices with I less than 100, E shall be equal to 0.30; (D) For devices with I equal to or greater than 100 but less than 250, E shall be equal to 0.15; or (E) For devices with I equal to or greater than 250, E shall be equal to 0.10. EU1 & EU2 shall be limited to 0.30 $lb/10^6$ BTU for particulate matter.
12.	Env-A 2103.02(c)(1)	Facility Wide	Calculation of Particulate Matter Emission Standards. Particulate matter emissions from a ANew Device≅ (from a process, manufacturing and service based industry) installed after February 18, 1972 with a process weight rate up to 60,000 pounds per hour, shall not exceed the emission rate (in pounds per hour) averaged over a one hour period as specified in the formula below, where P (the process weight rate in tons per hour) shall be raised to the 0.67 power and multiplied by 4.10: $E = 4.10\ P^{0.67}$
13.	Env-A 2107.01(a)	Facility Wide	Unless otherwise specified in Env-A 2100, no person shall cause or allow visible fugitive emissions or visible stack emissions for any process, manufacturing or serviced-based industry subject to this chapter to exceed an average of 20 percent opacity for any continuous 6-minute period in any 60 minute period, except where opacity is specified differently for fuel burning devices in Env-A 2003.02.
14.	40 CFR 52[2]	Facility Wide	The sulfur content of natural gas shall not exceed 5 grains of sulfur per 100 cubic feet.
15.	1990 CAAA Section 112(r)(1)	Facility Wide	The facility is subject to the Purpose and General Duty clause of the 1990 Clean Air Act, Section 112(r)(1). General Duty includes the following responsibilities: 1. Identify potential hazards which may result from such releases using appropriate hazard assessment techniques; 2. Design and maintain a safe facility; 3. Take steps necessary to prevent releases; and

[2] Env-A 402.03, effective on December 27, 1990, was adopted as part of the State Implementation Plan (SIP) on September 14, 1992 and is still considered federally enforceable until such time as the SIP is amended and approved by the EPA.

Table 5 - Federally Enforceable Operational and Emission Limitations			
			4. Minimize the consequences of accidental releases which do occur.

VIII. C. Emission Reductions Trading Requirements

The Permittee did not request emissions reductions trading in its operating permit application. At this point, DES has not included any permit terms authorizing emissions trading in this permit. All emission reductions trading, must be authorized under the applicable requirements of either Env-A 3000 (the AEmissions Reductions Credits (or ERCs) Trading Program≅) or Env-A 3100 (the ADiscrete Emissions Reductions (or DERs) Trading Program≅) and 42 U.S.C. ∋7401 et seq. (The AAct≅), and must be provided for in this Permit.

VIII. D. Monitoring/Testing Requirements

The Permittee is subject to the monitoring/ testing requirements as contained in Table 6 below:

Table 6 - Monitoring/Testing Requirements

Item #	Control Device	Parameter	Method of Compliance	Frequency of Method	Regulatory Cite
1.	Facility Stacks and boilers	Allows for adequate dispersion of HAPs and other regulated pollutants	Conduct an annual inspection of each stack and fuel burning device. Records of inspections and subsequent maintenance conducted as a result of the annual inspections shall be kept on file at the Facility for review by the DES and/or EPA upon request.	Annually	40 CFR 70.6(a)(3) Federally Enforceable
2.	EU1 and EU2	Periodic Monitoring	The boilers shall be inspected and maintained in accordance with the manufacturers recommendations or appropriate National Board Inspection Codes and tested for efficient operation at least once each calendar year. The permittee shall record results of inspection, maintenance, testing of the boiler, and date upon which it was performed. These records shall be maintained on site for a minimum of five years.	Annually, before April 1st	40 CFR 70.6(a)(3)(i)(B) Federally Enforceable
3.	EU1 and EU2	Sulfur content in gaseous fuels	The operator shall conduct testing to determine compliance with the sulfur content limitation provisions in Env-A 1600 for gaseous fuels.	Upon written request by EPA or DES	Env-A 809.02 Federally Enforceable
4.	EU1 and EU2	Opacity Measurement	Opacity measurements shall be conducted following the procedures set forth in 40 CFR Part 60, Appendix A, Method 9, VISUAL DETERMINATION OF THE OPACITY OF EMISSIONS FROM STATIONARY SOURCES. The opacity measurements shall be taken over 60 minutes during normal operation of the device.	As needed	Env-A 810.03 Federally Enforceable
5.	PC1	Preventative Maintenance	Visually inspect each hand spray booth dry filter pad and replace as necessary. Record booth number and date of pad change. Keep records of pad changes maintained on site for a minimum of five years, available for review by DES and/or EPA upon request.	Once each shift	40 CFR 70.6(a)(3)(i)(B) Federally Enforceable
6.	PC2	Preventative Maintenance	Perform daily inspection of the water level controls for the water curtain overspray collection systems in each of the whole hide and side spray booths. Take corrective actions and/or perform necessary maintenance to operate overspray collection system following recommended manufacturer=s specifications. Maintain records of maintenance performed on site for a minimum of five years, available for review by DES and/or EPA upon request.	Daily	40 CFR 70.6(a)(3)(i)(B) Federally Enforceable

VIII. E. Record keeping Requirements

The Permittee is subject to the Record keeping requirements as contained in Table 7 below:

Table 7 - Applicable Record keeping Requirements

Item #	Record keeping Requirement	Frequency of Record keeping	Applicable Emission Unit	Regulatory Cite Federally Enforceable or State-Only Enforceable
1.	The Permittee shall retain records of all required monitoring data, record keeping and reporting requirements, and support information for a period of at least 5 years from the date of the origination.	Retain for a minimum of 5 years	Facility Wide	40 CFR 70.6(a)(3)(ii)(B) Federally Enforceable
2.	The permittee shall maintain records of monitoring and testing as specified in Table 6 of this permit for: (A) preventative maintenance and inspection results for stacks and fuel burning devices; (B) periodic monitoring requirements for the boilers; (C) sulfur content of gaseous fuels; and (D) opacity measurements.	Maintain on a continuous basis as specified in Table 5 of this permit	Facility Wide	40 CFR 70.6(a)(3)(iii)(A) Federally Enforceable
3.	Record and maintain records of the amounts of natural gas combusted during each day.	Daily, monthly, and annually	EU1 & EU2	40 CFR 60 Subpart Dc Section 60.48c(g) Federally Enforceable
4.	Record data as to the distribution of the fuel utilization among the insignificant activities (three preheaters and space heaters). Such distribution may be estimated, but estimates shall be based on reliable operational data. Keep records of monthly and consecutive 12-month hours of operation and fuel consumption for all emergency generators.	Monthly and annually	Insignificant Activities & All Emergency Generators	Env-A 901.03
5.	Monthly records shall be kept regarding the total quantities of raw materials used; including hide throughput and coating chemicals used for each permitted device. The number of hours of operation for each permitted device shall be tracked on a daily, weekly, monthly, and annual basis.	Daily, weekly, monthly, and annually	Facility Wide	Env-A 901.04 Federally Enforceable
6.	NOx Record keeping Requirements: (A) For fuel burning devices and incinerators, including boilers, turbines, and internal combustion engines, the following information shall be recorded and maintained: (1) Facility information, including: a. Source name; b. Source identification; c. Physical address; d. Mailing address; and e. A copy of the certificate of accuracy required to be maintained pursuant to Env-A 901.04(c).	Daily, weekly, monthly, and annually	Facility Wide	Env-A 901.08 Federally Enforceable

Table 7 - Applicable Record keeping Requirements				
	(2) Identification of fuel burning device or incinerator; (3) Operating schedule information for each fuel burning device or incinerator identified in (A)(2), above, including; a. Days per calendar week during the normal operating schedule; b. Hours per day during the normal operating schedule and for a typical ozone season day, if different from the normal operating schedule; and c. Hours per year during the normal operating schedule; (4) Type, and amount of fuel or waste burned, for each fuel burning device or incinerator, during normal operating conditions and for a typical ozone season day, if different from normal operating conditions, on an hourly basis in million Btu=s per hour or, for incinerators, in tons per hour; (5) The following NOx emission data, including records of total annual emissions, in tons per year, and typical ozone season day emissions, in pounds per day: a. Theoretical potential emissions for the calculation year for each fuel burning device or incineration unit; and b. Actual NOx emissions for each fuel burning device or incineration unit.			
7.	VOC Record keeping Requirements: The following information shall be recorded and maintained for each permitted device. (A) Operating schedule information including the following information: (1) Days per calendar week during the normal operating schedule; (2) Hours per day during the normal operating schedule and for a typical ozone season day, if different from the normal operating schedule; and (3) Hours per year during the normal operating schedule. (B) Coating, dye, and stain formulation and analytical data including the following information for each device: (1) Material supplier; (2) Name and color; (3) Type; (4) Identification number; (5) Density described as lbs/gal; (6) Total volatile content described as weight percent; (7) Water content described as weight percent; (8) Exempt solvent content described as weight percent; (9) VOC content described as weight percent; (10) Solids content described as volume percent; (11) Diluent name and identification number; (12) Diluent solvent density described as lbs/gal; (13) Diluent VOC content described as weight percent; (14) Diluent exempt solvent content described as weight	Daily, weekly, monthly, and annually	Facility Wide	Env-A 901.06(a), (b), (c), & (d) Federally Enforceable

Table 7 - Applicable Record keeping Requirements				
	percent; (15) Volume of diluent VOC described as gal; and (16) Diluent/solvent ratio described as gal diluent solvent/gal of coating. (C) Daily solvent throughput data, including documentation necessary to show compliance with rolling average emission limits, total annual and typical ozone season day throughput, in gallons consumed, of each coating provided in the same manner as specified in condition (B) above, for each device. Daily solvent throughput data may be calculated using typical formulation equations plus a 10 percent adjustment factor for formula variations made on the floor and corrected monthly based on monthly facility inventory records. The accuracy of the 10 percent adjustment factor shall be reviewed and appropriately adjusted on a yearly basis. (D) Process information for each process line compiled and maintained for both the normal operating schedule and for a typical ozone season day, if different from the normal operating schedule, including the following: (1) Method of application; (2) Number of coats; (3) Drying method; and (4) Substrate type and form. n pu in			
7. (Cont.)	VOC Record keeping Requirements (continued) (E) The following VOC emission data, including records of daily emissions and 365 day rolling emissions totals in pounds per day and total annual emissions, in tons per year shall be maintained at the facility: (1) Theoretical potential emissions, as determined in Env-A 803.03 or Env-A 803.04, whichever is applicable; (2) Actual VOC emissions from each device; (3) Estimated emissions method code; and (4) Emission factors, if used to calculate emissions.	Daily, weekly, monthly, and annually	Facility Wide	Env-A 901.06(a), (b), (c), & (d) Federally Enforceable
8.	Annual records of actual emissions for each insignificant activity for determination of emission based fees.	Maintain at facility at all times.	Insignificant activities	Env-A 901.04 Federally Enforceable

VIII. F. Reporting Requirements

The Permittee is subject to the federally enforceable reporting requirements identified in Table 8 below:

	Table 8 - Applicable Reporting Requirements			
Item #	Reporting Requirement	Frequency of Reporting	Applicable Emission Unit	Regulatory Cite Federally Enforceable or State-Only Enforceable
1.	VOC Reporting Requirements: (A) All sources subject to the reporting requirements of this section shall submit the following information to the director in accordance with the schedule in Env-A 901.07(h): (1) Facility information, including: a. Source name; b. Source identification; c. Physical address; d. Mailing address; and e. A copy of the certificate of accuracy required to be maintained pursuant to Env-A 901.04(c). (2) Identification of each device or process operating at the source identified in (A)(1), above; (3) Operating schedule information for each device or process identified in (A)(2), above, including such information for:	Annually (no later than April 15th of the following year)	Facility Wide	Env-A 901.07(c)

	Table 8 - Applicable Reporting Requirements			
	a. A typical business day; and b. A typical high ozone season day, if different from a typical business day; (4) Total quantities of actual VOC and NOx emissions for the entire facility and for each device or process identified in (A)(2), above, including: a. Annual VOC emissions, and b. Typical high ozone season day VOC emissions.			
2.	NOx Reporting Requirements: For fuel burning devices and incinerators, including boilers, turbines and engines, as well as asphalt plant dryers and miscellaneous sources, the owner or operator shall submit to the director, annually (no later than April 15th of the following year), reports of the data required by Env-A 901.08, including total annual quantities of all NO_x emissions.	Annually (no later than April 15th of the following year)	Facility Wide	Env-A 901.09
3.	The permittee shall submit an annual fuel usage report indicating monthly fuel usage with corresponding annual fuel usage totals and corresponding fuel information as outlined in Table 7, Items 3. and 4.	Annually (no later than April 15th of the following year)	Facility Wide	40 CFR 70.6 (a)(1)
4.	For each coating operation, applicable throughput and process data information compiled through the calendar year (January 1st through December 31st) as outlined in Condition VIII.E. Table 7, Item 4. shall be submitted to the DES by April 15th of the following year.	Annually (no later than April 15th of the following year)	Facility Wide	40 CFR 70.6(a)(1)
5.	Prompt reporting of deviations from Permit requirements within 8 hours of such an occurance by phone or fax in accordance with Section XXVIII. of this Permit.	Prompt reporting (ie; within 8 hours of an occurrence).	Facility Wide	Env-A 902.02 & 40 CFR 70.6(a)(3)(iii)(B)
6.	The Permittee shall submit to the DES a summary report of monitoring and testing requirements every 6 months. All instances of deviations from Permit requirements must clearly be identified in such reports. All required reports must be certified by a responsible official consistent with section 70.5(d). The report shall contain a summary of the following information: (A) Preventative maintenance and inspection results for stacks and fuel burning devices; (B) A summary report of the boiler periodic monitoring test results required in the Applicable Monitoring/Testing section of this permit; (C) Opacity readings.	Every 6 months by July 31st and January 31st of each calendar year.	Facility wide	40 CFR 70.6(a)(3)(iii)(A) Federally Enforceable
7.	Any report submitted to the DES and/or EPA shall include the compliance certification statement as outlined in Section XXI.B. of this Permit and shall be signed by the responsible official.	As specified	Facility wide	40 CFR 70.6(c)(1)
8.	Annual reporting and payment of emission based fees shall be conducted in accordance with Section XXIII of this Permit	As specified in Section XXIII.	Facility wide	Env-A 704.03
9.	Annual compliance certification shall be submitted in accordance with Section XXI of this Permit.	April 15th	Facility wide	40 CFR 70.6(c)(1)

IX. Requirements Currently Not Applicable:

The Permittee did not identify any requirements which are not applicable to the facility.

General Title V Operating Permit Conditions

X. Issuance of a Title V Operating Permit:

A. This Permit is issued in accordance with the provisions of Part Env-A 609. In accordance with 40 CFR 70.6(a)(2) this Permit shall expire on the date specified on the cover page of this Permit, which shall not be later than the date five (5) years after issuance of this Permit.

Permit expiration terminates the Permittee's right to operate the Permittee's emission units, control equipment or associated equipment covered by this Permit, unless a timely and complete renewal application is submitted at least 6 months before the expiration date.

B. Pursuant to Env-A 609.02(b), this Permit shall be a state permit to operate as defined in RSA 125-C:11, III.

XI. Title V Operating Permit Renewal Procedures:

Pursuant to Env-A 609.06(b), an application for renewal of this Permit shall be considered timely if it is submitted to the Director at least six months prior to the designated expiration date of this Permit.

XII. Application Shield:

Pursuant to Env-A 609.07, if an applicant submits a timely and complete application for the issuance or renewal of a Permit, the failure to have a Permit shall not be considered a violation of this part until the Director takes final action on the application.

XIII. Permit Shield:

A. Pursuant to Env-A 609.08(a), a permit shield shall provide that:

1. For any applicable requirement or any state requirement found in the New Hampshire Rules Governing the Control of Air Pollution specifically included in this Permit, compliance with the conditions of this Permit shall be deemed compliance with said applicable requirement or said state requirement as of the date of permit issuance; and

2. For any potentially applicable requirement or any potential state requirement found in the New Hampshire Rules Governing the Control of Air Pollution specifically identified in Section IX of this Permit as not applicable to the stationary source or area source, the Permittee need not comply with the specifically identified federal or state requirements.

B. The permit shield identified in Section XIII.A. of this Permit shall apply only to those conditions incorporated into this Permit in accordance with the provisions of Env-A 609.08(b). It shall not apply to certain conditions as specified in Env-A 609.08(c) that may be incorporated into this Permit following permit issuance by DES.

C. If a Title V Operating Permit and amendments thereto issued by the DES does not expressly include or exclude an applicable requirement or a state requirement found in the NH Rules Governing the Control of Air Pollution, that applicable requirement or state requirement shall not be covered by the permit shield and the Permittee shall comply with the provisions of said requirement to the extent that it applies to the Permittee.

D. If the DES determines that this Title V Operating Permit was issued based upon inaccurate or incomplete information provided by the applicant or Permittee, any permit shield provisions in said Title V Operating Permit shall be void as to the portions of said Title V Operating Permit which are affected, directly or indirectly, by the inaccurate or incomplete information.

E. Pursuant to Env-A 609.08(f), nothing contained in Section XIII of this Permit shall alter or affect the ability of the DES to reopen this Permit for cause in accordance with Env-A 609.18 or to exercise its summary abatement authority.

F. Pursuant to Env-A 609.08(g), nothing contained in Section XIII of this Permit or in any title V operating permit issued by the DES shall alter or affect the following:

1. The ability of the DES to order abatement requiring immediate compliance with applicable requirements upon finding that there is an imminent and substantial endangerment to public health, welfare, or the environment;

2. The state of New Hampshire's ability to bring an enforcement action pursuant to RSA 125-C:15,II;

3. The provisions of section 303 of the Act regarding emergency orders including the authority of the EPA Administrator under that section;

4. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

5. The applicable requirements of the acid rain program, consistent with section 408(a) of the Act;

6. The ability of the DES or the EPA Administrator to obtain information about a stationary source, area source, or device from the owner or operator pursuant to section 114 of the Act; or

7. The ability of the DES or the EPA Administrator to enter, inspect, and/or monitor a stationary source, area source, or device.

XIV. Reopening for Cause:

The Director shall reopen and revise a Title V Operating Permit for cause if any of the circumstances contained in Env-A 609.18(a) exist. In all proceedings to reopen and reissue a Title V Operating Permit, the Director shall follow the provisions specified in Env-A 609.18(b) through (g).

XV. Administrative Permit Amendments:

A. Pursuant to Env-A 612.01, the Permittee may implement the changes addressed in the request for an administrative permit amendment as defined in Part Env-A 100 immediately upon submittal of the request.

B. Pursuant to Env-A 612.01, the Director shall take final action on a request for an administrative permit amendment in accordance with the provisions of Env-A 612.01(b) and (c).

XVI. Operational Flexibility:

A. Pursuant to Env-A 612.02(a), the Permittee subject to and operating under this Title V Operating Permit may make changes involving trading of emissions under this existing Title V Operating Permit at the permitted stationary source or area source without filing a Title V Operating Permit application for and obtaining an amended Title V Operating Permit, provided that all the conditions are met as specified in Section XVI. A. 1. through 7. of this permit and a notice is submitted to the DES and EPA describing the intended changes. At this point, the DES has not included any permit terms authorizing emissions trading in this permit.

1. The change is not a modification under any provision of title I of the Act;

2. The change does not cause emissions to exceed the emissions allowable under the title V operating permit, whether expressed therein as a rate of emissions or in terms of total emissions;

3. The owner or operator has obtained any temporary permit required by Env-A 600;

4. The owner or operator has provided written notification to the director and administrator at least 15 days prior to the proposed change and such written notification includes:

    a. The date on which each proposed change will occur;

    b. A description of each such change;

    c. Any change in emissions that will result and how this change in emissions will comply with the terms and conditions of the permit;

    d. A written request that the operational flexibility procedures be used; and

    e. The signature of the responsible official, consistent with Env-A 605.04(b);

5. The title V operating permit issued to the stationary source or area source already contains terms and conditions including all terms and conditions which determine compliance required under 40 CFR 70.6(a) and (c) and which allow for the trading of emissions increases and decreases at the permitted stationary source or area source solely for the purpose of complying with a federally-enforceable emissions cap that is established in the permit independent of otherwise applicable requirements;

6. The owner or operator has included in the application for the title V operating permit proposed replicable procedures and proposed permit terms which ensure that the emissions trades are quantifiable and federally enforceable for changes to the title V operating permit which qualify under a federally- enforceable emissions cap that is established in the title V operating permit independent of the otherwise applicable requirements; and

7. The proposed change complies with Env-A 612.02 (e).

B. Pursuant to Env-A 612.02(c), the Permittee subject to and operating under this Title V Operating Permit may make changes not addressed or prohibited by this existing Title V Operating Permit at the permitted stationary source or area source without filing a Title V Operating Permit application, provided that all the conditions specified in Env-A 612.02(c)(1) through (6) are met and a notice is submitted to the DES and EPA describing the intended changes.

C. Pursuant to Env-A 612.02(d), the Permittee, Operator, Director and Administrator shall attach each notice of an off-permit change completed in accordance with Section XVI of this Title V Operating Permit to their copy of the current Title V Operating Permit.

D. Pursuant to Env-A 612.02(e), any change under Section XVI shall not exceed any emissions limitations established under the NH Rules Governing the Control of Air Pollution, or result in an increase in emissions, or result in new emissions, of any toxic air pollutant or hazardous air pollutant other than those listed in the existing Permit.

E. Pursuant to Env-A 612.02(f), the off-permit change shall not qualify for the permit shield under Env-A 609.08.

XVII. Minor Permit Amendments:

A. Pursuant to Env-A 612.04 prior to implementing a minor permit modification, the Permittee shall submit a written request to the Director in accordance with the requirements of Env-A 612.04(b).

B. The Director shall take final action on the minor permit amendment request in accordance with the provisions of Env-A 612.04(c) through (g).

C. Pursuant to Env-A 612.04(h), the permit shield specified in Env-A 609.08 shall not apply to minor permit amendments under Section XVII. of this Permit.

D. Pursuant to Env-A 612.04(i), the Permittee shall be subject to the provisions of Part Env-A 614 and Part Env-A 615 if the change is made prior to the filing with the Director a request for a minor permit amendment.

XVIII. Significant Permit Amendments:

A. Pursuant to Env-A 612.05, a change at the facility shall qualify as a significant permit amendment if it meets the criteria specified in Env-A 612.05(a)(1) through (7).

B. Prior to implementing the significant permit amendment, the Permittee shall submit a written request to the Director and to the EPA which includes all the information as referenced in Env-A 612.05(b) and (c) and shall be issued an amended Title V Operating Permit from the DES. The Permittee shall be subject to the provisions of Env-A 614 and Env-A 615 if a request for a significant permit amendment is not filed with the Director and/or the change is made prior to the issuance of an amended Title V Operating Permit.

C. The Director shall take final action on the significant permit amendment in accordance with the procedures specified in Env-A 612.05(d), (e) and (f).

XIX. Title V Operating Permit Suspension, Revocation or Nullification:

A. Pursuant to RSA 125-C:13, the Director may suspend or revoke any final permit issued hereunder if, following a hearing, the Director determines that:

1. the Permittee has committed a violation of any applicable statute or state requirement found in the New Hampshire Rules Governing the Control of Air Pollution, order or permit condition in force and applicable to it; or

2. that the emissions from any device to which this Permit applies, alone or in conjunction with other sources of the same pollutants, presents an immediate danger to the public health.

B. The Director shall nullify any Permit, if following a hearing in accordance with RSA 541-A:30, II, a finding is made that the Permit was issued in whole or in part based upon any information proven to be intentionally false or misleading.

XX. Inspection and Entry:

Pursuant to Env-A 614.01, EPA and DES personnel shall be granted access to the facility covered by this Permit, in accordance with RSA 125-C:6,VII for the purposes of: inspecting the proposed or permitted site; investigating a complaint; and assuring compliance with any applicable requirement or state requirement found in the NH Rules Governing the Control of Air Pollution and/or conditions of any Permit issued pursuant to Chapter Env-A 600.

XXI. Certifications:

A. Compliance Certification Report

In accordance with 40 CFR 70.6(c) the Responsible Official shall certify, annually from the date of issuance, that the facility is in compliance with the requirements of this permit. The report shall be submitted to the DES and to the Regional Administrator, U.S. Environmental Protection Agency - New England Region. The report shall be submitted in compliance with the submission requirements below.

In accordance with 40 CFR 70.6(c)(5), the report shall describe:

1. The terms and conditions of the Permit that are the basis of the certification;

2. The current compliance status of the source with respect to the terms and conditions of this Permit, and whether compliance was continuous or intermittent during the reporting period;

3. The methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods; and

4. Any additional information required by the DES to determine the compliance status of the source.

B. Certification of Accuracy Statement

All documents submitted to the DES shall contain a certification of accuracy statement by the responsible official of truth, accuracy, and completeness. Such certification shall be in accordance with the requirements of 40 CFR 70.5(d) and contain the following language:

"I am authorized to make this submission on behalf of the facility for which the submission is made. Based on information and belief formed after reasonable inquiry, I certify that the statements and information in the enclosed documents are to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

XXII. Enforcement:

Any noncompliance with a permit condition constitutes a violation of RSA 125-C:15, and, as to the conditions in this permit which are federally enforceable, a violation of the Clean Air Act, 42 U.S.C. section 7401 et seq., and is grounds for enforcement action, for permit termination or revocation, or for denial of an operating permit renewal application by the DES and/or EPA. Noncompliance may also be grounds for assessment of administrative, civil or criminal penalties in accordance with RSA 125-C:15 and/or the Clean Air Act. This Permit does not relieve the Permittee from the obligation to comply with any other provisions of RSA 125-C, the New Hampshire Rules Governing the Control of Air Pollution, or the Clean Air Act, or to obtain any other necessary authorizations from other governmental agencies, or to comply with all other applicable Federal, State, or Local rules and regulations, not addressed in this Permit.

In accordance with 40 CFR 70.6 (a)(6)(ii) a Permittee shall not claim as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.

XXIII. Emission-Based Fee Requirements:

A. The Permittee shall pay an emission-based fee annually for this facility as calculated each calendar year pursuant to Env-A 704.03.

B. The Permittee shall determine the total actual annual emissions from the facility to be included in the emission-based multiplier specified in Env-A 704.03(a) for each calendar year in accordance with the methods specified in Env-A 620.

C. The Permittee shall calculate the annual emission-based fee for each calendar year in accordance with

$$FEE = E * DPT * CPIm * ISF$$

the procedures specified in Env-A 704.03 and the following equation:
Where:

FEE = The annual emission-based fee for each calendar year as specified in Env-A 704.
E = The emission-based multiplier is based on the calculation of total annual emissions as specified in Env-A 704.02 and the provisions specified in Env-A 704.03(a).
DPT = The dollar per ton fee the DES has specified in Env-A 704.03(b).
CPIm= The Consumer Price Index Multiplier as calculated in Env-A 704.03(c).
ISF = The Inventory Stabilization Factor as specified in Env-A 704.03(d).

D. The Permittee shall contact the DES each calendar year for the value of the Inventory Stabilization Factor.

E. The Permittee shall contact the DES each calendar year for the value of the Consumer Price Index Multiplier.

F. The Permittee shall submit, to the DES, payment of the emission-based fee and a summary of the calculations referenced in Sections XXIII.B. and C of this Permit for each calendar year by October 15th of the following calendar year in accordance with Env-A 704.04. The emission-based fee and summary of the calculations shall be submitted to the following address:

New Hampshire Department of Environmental Services
Air Resources Division
64 North Main Street
P.O. Box 2033
Concord, NH 03302-2033
ATTN: Emissions Inventory

G. The DES shall notify the Permittee of any under payments or over payments of the annual emission-based fee in accordance with Env-A 704.05.

XXIV. Duty To Provide Information

In accordance with 40 CFR 70.6 (a)(6)(v), upon the DES's written request, the Permittee shall furnish, within a reasonable time, any information necessary for determining whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall furnish to the DES copies of records that the Permittee is required to retain by this Permit. The Permittee may make a claim of confidentiality as to any information submitted pursuant to this condition in accordance with Part Env-A 103 at the time such information is submitted to the DES. The DES shall evaluate such requests in accordance with the provisions of Part Env-A 103.

XXV. Property Rights

Pursuant to 40 CFR 70.6 (a)(6)(iv), this Permit does not convey any property rights of any sort, or any exclusive privilege.

XXVI. Severability Clause

Pursuant to 40 CFR 70.6 (a)(5), the provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstances is held invalid, the application of such provision to other circumstances, and the remainder of this Permit, shall not be affected thereby.

XXVII. Emergency Conditions

Pursuant to 40 CFR 70.6 (g), the Permittee shall be shielded from enforcement action brought for noncompliance with technology based[3] emission limitations specified in this Permit as a result of an

[3] Technology based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain health based air quality standards.

emergency[4]. In order to use emergency as an affirmative defense to an action brought for noncompliance, the Permittee shall demonstrate the affirmative defense through properly signed, contemporaneous operating logs, or other relevant evidence that:

A. An emergency occurred and that the Permittee can identify the cause(s) of the emergency;

B. The permitted facility was at the time being properly operated;

C. During the period of the emergency, the Permittee took all reasonable steps as expeditiously as possible, to minimize levels of emissions that exceeded the emissions standards, or other requirements in this Permit; and

D. The Permittee submitted notice of the emergency to the DES within two (2) business days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

XXVIII. Permit Deviation

In accordance with 40 CFR 70.6(a)(3)(iii)(B), the Permittee shall report to the DES all instances of deviations from Permit requirements, by telephone or fax, within 8 hours of discovery of such deviation pursuant to Env-A 902.02. This report shall include the deviation itself, including those attributable to upset conditions as defined in the Permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. Said Permit deviation shall also be submitted in writing to the DES within fifteen (15) days of documentation of the deviation by facility personnel. Deviations are instances where any Permit condition is violated and has not already been reported as an emergency pursuant to Section XXVII of this Permit.

Reporting a Permit deviation is not an affirmative defense for action brought for noncompliance.

[4] An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation would require immediate corrective action to restore normal operation, and that causes the source to exceed a technology based limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operations, operator error or decision to keep operating despite knowledge of any of these things.

APPENDIX A

Attachment 1 - List of All Emergency Generators at Prime Tanning

List of All Emergency Generators at Prime Tanning			
Location/Description	Number of Units	Generator Gross Heat Input Rate (mmBtu/hr)	Type of Fuel
Production Area	1	1.02	Natural Gas
Back-up Power to Computer Systems	1	0.8128	Natural Gas